

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(COLUMBIA DIVISION)**

WHEREAS, Defendants expressly reserve all rights, defenses, objections, and counterclaims, including, but not limited to, all rights to object to any Lead Plaintiff Motion(s); and

WHEREAS, this is the first request made to this Court to alter the time for Defendants to respond to the Complaint.

Accordingly, the parties, by and through their respective counsel signed below, jointly move the Court for the entry of an order providing the following:

1. No Defendant shall be required to respond to the Complaint in any manner until after the Court rules on any Lead Plaintiff Motion(s).

2. In the event an order is entered appointing lead plaintiff(s) and lead counsel, the parties will confer regarding a reasonable schedule for Defendants' response to any complaint and will propose an agreed-upon schedule to the Court, or if the parties are unable to agree on such a schedule, they will propose alternative schedules to the Court.

3. Nothing herein shall limit, waive, abrogate, or in any other manner prejudice any defenses, objections, and counterclaims that might be raised by Defendants in connection with the Lead Plaintiff Motion(s), any response to the Complaint, or any other matter in this action.

WE SO MOVE AND CONSENT:

s/Daryl G. Hawkins

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**pro hac vice application to be submitted*

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